

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

19 cr. 676 (PGG)

- against -

**DECLARATION**

ALEXEI SAAB,

Defendant.

-----x

STATE OF NEW YORK )  
COUNTY OF NEW YORK: ss. :  
SOUTHERN DISTRICT OF NEW YORK)

MARLON G. KIRTON, Esq., pursuant to Title 28, United States Code, section 1746,  
hereby declares under the penalties of perjury:

I am counsel for the defendant ALEXEI SAAB, and I make this declaration in support of  
the various forms of relief, as set forth in the annexed Notice of Motion.

The statement asserted as facts are based upon an examination of the indictment, the  
discovery material provided by the Government, the trial exhibits, the trial transcripts and  
conversations with prosecutors and ALEXEI SAAB. All matters about which your deponents  
lack personal knowledge are asserted herein upon information and belief.

ALEXEI SAAB was convicted after a jury trial of receiving military training from a  
designated terrorist organization.

Counsel moves to this Court grant an Order to granting a judgment of acquittal.

**WHEREFORE**, your declarant prays for an Order granting the relief requested in the Notice of Motion, or in the alternative a hearing to resolve the issues raised therein and for such other and further relief as to this Court may seem just and proper.

Dated: New York, New York  
May 25, 2022

s/Marlon G. Kirton  
MARLON G. KIRTON